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*Attorneys for Defendants
Nevada Department of Corrections (NDOC),
James Baumgras, Karissa Currier,
Marquise L. Franklin, Nicole Holston,
Gabriela Garcia-Najera, Dean Medeiros,
Michael Minev, Jennifer Nash, Dwight Neven,
Ronald Oliver, Luis Rivera, Dario Sanchez,
Andrew Trujillo, and Harold Wickham*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROSEMARY VANDECAR,

Plaintiff,

v.

CHARLES DANIELS, *et al.*,

Defendants.

Case No. 2:20-cv-02150-ART-VCF

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINE TO
FILE RESPONSIVE PLEADING TO
FOURTH AMENDED COMPLAINT
ECF NO. 94
(FIRST REQUEST)**

The parties, by and through their respective counsel of record, hereby stipulate to extend the deadline for Defendants to respond to the Fourth Amended Complaint (FAC) filed at ECF No. 94. This is the parties' first stipulation to extend the deadline to file a responsive pleading to the FAC.

Pursuant to FRCP 15(a)(3), the deadline to file a response to an amended pleading is fourteen (14) days. The parties hereby agree to extend that deadline, because there is a new Defendant added in the FAC, Dr. Michael Minev, and the Office of the Attorney General (OAG) has been authorized to accept service on his behalf. The OAG will also be

reaching out to determine whether Defendants Edison Rojas (ECF No. 80) and Maritza Velasco-Avila (ECF No. 71) wish to seek representation in this matter.

The proposed extended deadlines would correspond to the standard deadlines issued for inmate litigation that does not settle at the early mediation conference, allowing the OAG twenty-one (21) days to identify those Defendants for whom it will accept service, and sixty (60) days to file the first responsive pleading.

PROPOSED DEADLINES:

Notice of acceptance of service – August 4, 2023

First responsive pleading – September 12, 2023

DATED this 19th day of July, 2023.

DATED this 19th day of July, 2023

AARON D. FORD
Attorney General

By: /s/ Andréa L. Vieira
ANDRÉA L. VIEIRA (Bar No. 15667)
Attorneys for Plaintiff

By: /s/ Leo T. Hendges
LEO T. HENDGES (Bar No. 16034)
Deputy Attorney General
Attorneys for Defendants

ORDER

Upon Stipulation of the parties, and good cause appearing therefor, it is hereby **ORDERED** deadlines to respond to the Fourth Amended Complaint shall be extended per the parties' stipulation.

IT IS SO ORDERED.

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DATED _____, 2023.


UNITED STATES ~~DISTRICT~~ JUDGE

Magistrate